

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JACQUELINE ONOFRE, INDIVIDUALLY
AND A/N/F OF LUKE ONOFRE and
HANNAH ONOFRE, MINORS
V.

C.R. ENGLAND and
PAUL JOHNSON

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CIVIL ACTION NO. 5:15-cv-00425

DEFENDANTS, C.R. ENGLAND and PAUL JOHNSON'S
NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:

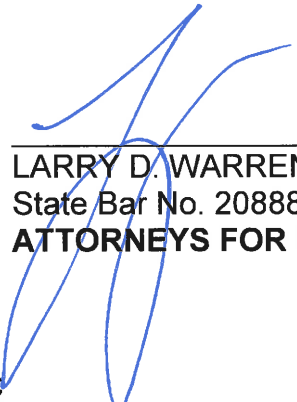
Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **C.R. ENGLAND and PAUL JOHNSON**, hereby removes this action to the United States District Court for the Southern District of Texas from the 57th Judicial District Court of Bexar County, Texas, stating as follows:

1. Plaintiffs, Jacqueline Onofre, Individually and a/n/f of Luke Onofre and Hannah Onofre, Minors, commenced this action in the 57th Judicial District Court of Bexar County, Texas, where it was given Cause No. 2015CI04787. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant C.R. England, Inc. is a Utah Corporation and Defendant Paul Johnson is a resident of Indiana. Further, Plaintiffs claim damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.
2. Defendants, C.R. England and Paul Johnson received the summons and complaint on May 11, 2015, so this removal is timely under 28 U.S.C. § 1446(b).

3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.
4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 57th Judicial District Court of Bexar County, Texas.
5. Defendants C.R. England and Paul Johnson consents to the removal.

Dated: May 12, 2015

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
ATTORNEYS FOR DEFENDANTS

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of May 2015, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

E-Filing Notification System:

Thomas J. Henry

SBN: 09484210

Robert P. Wilson

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